

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

In Re:)	
)	
RAY A BOHANAN)	Case No. 13-15540-JDL
TERESA A BOHANAN)	
Debtors.)	Chapter 13

**AMENDED
MOTION TO MODIFY CONFIRMED PLAN,
REQUEST FOR COMPENSATION WITH BRIEF IN SUPPORT
AND NOTICE OF OPPORTUNITY FOR HEARING**

COMES NOW Debtors Ray and Teresa Bohanan, and Moves the Court for an order modifying the Chapter 13 Plan confirmed by the Court on June 11, 2014 and in support thereof states as follows:

1. On December 23, 2013, the Debtors filed a Petition under Chapter 13 of the Bankruptcy Code.
2. On June 11, 2014 this Court entered its Order Confirming Plan.
3. After confirmation Debtor Teresa Bohanan quit her job because of health reasons. Teresa Bohanan received her last paystubs on October 31st, 2014 and retained new employment in January, 2015 for less pay than her previous employment.
4. Because of the loss of employment and subsequent reduction in income, the Plan is no longer feasible.
5. Debtors move to modify the Chapter 13 Plan, to wit:
 - a. The Debtor be treated as current through August, 2015.
 - b. Payments to be decreased to \$292.43 per month beginning September, 2015 and for the remainder of the plan.
 - c. The Plan be modified from a percentage plan to a base plan guaranteeing no set dividend to unsecured creditors. The amount required to be paid to unsecured creditors based upon the means test shall be reduced from \$91,081.20 to \$0.00.
 - d. To provide that counsel for Debtor receive \$500.00 for services rendered in this matter pursuant to the Local Guidelines for post-confirmation services and without the necessity of filing an application for the same.
6. The modification is necessary to make the plan feasible.

WHEREFORE, premises considered, Debtor respectfully requests this Court issue an Order Modifying Debtor's Chapter 13 Plan.

Respectfully submitted,

/s Tearsa Storms Olson

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NOTICE OF OPPORTUNITY FOR HEARING

Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document. If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Avenue, Oklahoma City, OK 73102 no later than twenty-one (21) days from the date of filing of this request for relief. You should also serve a file stamped copy of your response or objection to the undersigned movant/movant's attorney [and others who are required to be served] and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice.

The 21 day period includes the three (3) days allowed for mailing provided in Bankruptcy Rule 9006(f).